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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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November 16, 1992

Mr. George Harenberg
Federal Communications Commission
2025 M Street, Room 7122-A
Washington, D.C. 20554

RM-8094

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NOV 19 1992

Technical
Authorization

Reg. Branch
Action Division

Re: Request for Acceptance of Late Comments

Dear Mr. Harenberg:

On November 2, 1992, Thomson Consumer Electronics, Inc. sought to file with the Federal Communications Commission the enclosed Comments in response to the Telecommunications Industry Association petition for Rule Making concerning the allocation of additional frequencies for use by cordless telephones. When we learned that our name was not among the list of Commenters, we discovered that our courier service had misdirected our Comments to the Securities and Exchange Commission.

Jim Keegan suggested that I write directly to you requesting that our Comments be accepted even though the filing date has expired. We certainly appreciate your consideration of our request.

Sincerely,

Wray C. Hiser

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)
)

Amendment of the)
Commission's Rules to) RM-8094
Establish New Frequencies)
for Cordless Telephones)
near 44 and 49 MHz)

FILED BY THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

Introduction

On August 20, 1992, the Telecommunications Industry Association ("TIA") filed with the Commission a Petition for Rule Making therein requesting the Commission to issue a Notice of Proposed Rule Making proposing that additional frequencies be allocated for use by cordless telephone.

Thomson Consumer Electronics, Inc., ("Thomson "), a member of the TIA and a leading manufacturer and marketer of cordless telephones under the GE brand, has a keen interest in the action of the Commission in this matter and wishes to submit the following Comments in connection therewith.

Specific Comments

Thomson, as a member of the TIA, has been an active participant in developing the subject Petition for Rule Making and, as such, fully supports the Petition as it relates to the establishment of additional operating frequencies for cordless telephones. The great popularity of cordless phones and their wide acceptance by the consumer have resulted in the clear need for additional frequency spectrum. Thomson urges the Commission to act quickly upon the TIA's Petition and issue its Notice of Proposed Rule Making as soon as possible.

Thomson, however, has a significant concern with one aspect of the TIA's petition, namely, the provision requiring cordless phones to automatically monitor the transmitting frequencies to avoid interference with co-channel users. Although Thomson does not disagree with the importance of avoiding co-channel interference, the cost and technical effort involved in designing and implementing an automatic monitoring system would be prohibitive, given the relative low cost of today's cordless phones.

Thomson therefore proposes an alternative implementation, in which the cordless phone would monitor the availability of a frequency during the initial one second of transmission. If interference were detected, the phone would change transmission frequency. This system realizes the valuable advantage of avoiding co-channel interference while maintaining a cost effective method of implementation that does not unreasonably burden the telephone manufacturer with expensive and arguably unnecessary design requirements.

Conclusion

Thomson therefore urges the Commission to act speedily upon the TIA's Petition in issuing its Notice of Proposed Rule Making.

Furthermore, Thomson respectfully requests the Commission to reject the proposal of the TIA requiring automatic monitoring of transmission frequencies and, as an alternative, accept the proposal of Thomson in which transmission frequency monitoring would take place within the first one second of transmission.

Respectfully submitted,

THOMSON CONSUMER ELECTRONICS, INC.

BY Wray C. Hiser

Wray C. Hiser

Associate General Counsel

November 2, 1992